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March 25, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722-4438

Re: Superb Motors Inc., et al. v. Deo, et al.
Case No.: 2:23-cv-6188 (JMW)

Dear Judge Wicks:

Together with Milman Labuda Law Group PLLC and Cyruli Shanks Zizmor LLP, this office represents the Plaintiffs in the above-referenced case. Plaintiffs write to respectfully request leave of this Court to file a reply memorandum of law in further support of their cross-motion for leave to amend the pleadings vis-à-vis Defendant Flushing Bank's motion to dismiss in excess of the 2,500 word count limit for reply memoranda set forth in ¶ (C)(2) of this Court's Individual Practice Rules.

Plaintiffs respectfully submit that good cause exists to enlarge the word count limit to 3,600 words to adequately address the arguments raised by Flushing Bank in opposition to Plaintiffs' cross-motion. Plaintiffs' brief currently stands at 3,399 words but some cushion is sought to permit the IAG Plaintiffs the ability to review and revise the reply memorandum this evening before serving upon all counsel of record as their counsel is observing the Passover holiday and will be unavailable until after sunset. Accordingly, Plaintiffs' request for leave to enlarge the word count limit up to 3,600 words should be granted. Plaintiffs thank this Court for its continued time and attention to this matter.

Dated: Lake Success, New York
March 25, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC
/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York
March 25, 2024

Respectfully submitted,

SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.

Attorneys for Plaintiffs
Superb Motors Inc.
Team Auto Sales LLC and
Robert Anthony Urrutia

VIA ECF

All counsel of record